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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)
ITL.0546US (P11105)

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on January 9, 2006

Signature Cynthia L. Hayden

Typed or printed name Cynthia L. Hayden

Application Number	Filed
09/826,134	April 4, 2001

First Named Inventor: David K. Vavro

Art Unit	Examiner
2181	Tonia L. Meonske

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).
Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.

☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.
(Form PTO/SB/96)

☑ attorney or agent of record.
Registration number 28,994

☐ attorney or agent acting under 37 CFR 1.34.
Registration number if acting under 37 CFR 1.34 _____

Signature

Timothy N. Trop
Typed or printed name

(713) 468-8880
Telephone number

January 9, 2006
Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required.
Submit multiple forms if more than one signature is required, see below*.

☑ *Total of 1 forms are submitted.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Applicant: David K. Vavro	§	Art Unit:	2181
Serial No.: 09/826,134	§	Examiner:	Tonia L. Meonske
Filed: April 4, 2001	§	Docket:	ITL.0546US P11105
For: Using a Plurality of Processing Elements (As Amended)	§	Assignee:	Intel Corporation

Mail Stop **AF**
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

STATEMENT IN SUPPORT OF
PRE-APPEAL BRIEF REQUEST FOR REVIEW

Sir:

The gist of that rejection of claim 1 seems to revolve around something called a functional unit 301, which the office action contends is a central processing unit. Certainly, there seems to be no basis for this conclusion. Rather, the functional units, as explained in connection with paragraph 1, lines 18-37, work with a command unit, shown in Figure 13. The functional units perform addition, subtraction, and multiplication. Thus, they would not be what is conventionally called central processing units.

In the advisory action, the Examiner indicates that it is somehow relevant that in a rejection of a claim now canceled (claim 8) he relied on a different element as the central processing unit than he relies on in the rejection of claim 1. The rejection of claim 1 is explicit that the alleged central processing unit is the functional unit as addressed above. Certainly, if the Examiner wishes to change the basis for the rejection he can do so -- by withdrawing the final rejection.

Date of Deposit: January 9, 2006
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Cynthia L. Hayden

Cynthia L. Hayden

On the initial grounds, reconsideration is requested.

In addition, it is suggested that scoreboard bits and vacancy indicators are assigned to specific functional units.

The claim calls for a given central processing unit to reset its indicators when the data in a register is no longer useful to the central processing unit. The register referred to is one that is accessible by a plurality of central processing units.

The material in column 9, lines 55-65, is different than what is described in the claim. There, in response to a request for an operand by a command unit, the priority scoreboard checks the scoreboard bit and the vacancy (availability) of the functional unit to be used by the command. If the functional unit to be used by the command is available (vacant), the priority scoreboard sends a register available signal to the command unit unless the scoreboard bit for the register requested by the command unit is set.

Thus, there are two different things that the scoreboard indicates. One is that the scoreboard bit indicates the availability of a register and, further, it checks the vacancy or availability of the functional unit. As a result, there is no indicator assigned to a plurality of central processing units or even a plurality of functional units. Moreover, there is nothing that indicates that the functional unit can reset any such indicator. The only indicator in the scoreboard is the indicator that indicates the status of the register.

How the vacancy of the functional unit is determined by the scoreboard is never explained, but the operation, with respect to the scoreboard bit and the vacancy of the functional unit, are described differently. With respect to the availability of the register, it is indicated that the scoreboard checks the scoreboard bit "and the vacancy of the functional unit to be used by the command." Thus, there is no bit that indicates the vacancy or availability of the functional unit. Therefore, there is no different indicator assigned to each of a plurality of central processing units. The scoreboard bits are only assigned to registers which most certainly are not central processing units.

Likewise, there is no enabling of any of the functional units, even if they were central processing units, to reset any indicator when the data in a register is no longer useful to the central processing unit. The setting and resetting of the bits have nothing to do with whether or not the data in a register is useful to the central processing unit. Moreover, the central processing units do not have specified indicators, the registers do.

Therefore, reconsideration of the rejection of claim 1 would be appropriate.

On the same basis, reconsideration of the rejection of claim 11 is also appropriate.

Respectfully submitted,

Date: January 9, 2006

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